

UNITED STATES DISTRICT COURT
DISTRICT OF MASSACHUSETTS

SECURITIES AND EXCHANGE COMMISSION,)
Plaintiff,)
v.) Case No. 21-CV-11938 (DPW)
AMAR BAHADOORSINGH,)
Defendant.)

)

**PLAINTIFF'S MOTION FOR ENTRY OF DEFAULT AS TO
DEFENDANT AMAR BAHADOORSINGH**

Pursuant to Fed. R. Civ. P. 55, plaintiff Securities and Exchange Commission (“the Commission”) hereby moves for entry of default as to defendant Amar Bahadoorsingh (“Bahadoorsingh”). Bahadoorsingh has not responded to the Commission’s complaint and through discussions with his counsel, has indicated that he does not intend to respond.

Bahadoorsingh was validly served by email on December 14, 2021, by agreement of counsel. *See* Dkt No. 5 (Executed Summons, filed March 3, 2022).

Accordingly, Bahadoorsingh’s Answer to the Complaint was due by January 4, 2022, which is the date 21 days after he was served with the complaint by email. *See* Fed. R. Civ. P. 12(a)(1)(i). As of today, July 18, 2022, no answer or notices of appearance have been filed for defendant Bahadoorsingh. From approximately December 2021, through July 2022, plaintiff’s counsel was involved in a settlement dialogue with Bahadoorsingh’s counsel. Despite the parties’ considerable efforts, those discussions did not produce an agreement, and Bahadoorsingh’s counsel has indicated that Bahadoorsingh does not intend to plead in response to the Complaint.

The Commission requests that a default be entered by the Clerk as to Bahadoorsingh.

Upon the Clerk's entry of default, the Commission will move the Court for a default judgment as to Bahadoorsingh pursuant to Fed. R. Civ. P. 55(b)(2).

Dated: July 18, 2022

Respectfully submitted,

SECURITIES AND EXCHANGE COMMISSION

By its attorneys,

/s/ David J. D'Addio

David J. D'Addio (BBO# 665790)

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CERTIFICATE OF COMPLIANCE WITH LOCAL RULE 7.1

I hereby certify that I discussed my intention to file this motion with counsel for defendant Bahadoorsingh and that we were unable to resolve the issues raised in this motion.

Dated: July 18, 2022

/s/ David J. D'Addio

David J. D'Addio

CERTIFICATE OF SERVICE

I, David J. D'Addio, certify that on July 18, 2022, I filed the foregoing motion electronically with the Court. The filing will be sent to the registered participants as identified on the Notice of Electronic Filing and may also be accessed through the Court's ECF system. In addition, the Commission will serve a copy of the foregoing document by email on counsel for Bahadoorsingh.

/s/ David J. D'Addio

David J. D'Addio